

**WRONKO LOEWEN BENUCCI**

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*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

EDWIN POLYNICE, *individually and on  
behalf of a class of similarly situated  
individuals,*

*Plaintiff,*

vs.

NEW JERSEY DEPARTMENT OF  
CORRECTIONS, et al.,

*Defendants.*

Docket No. 2:19-cv-16875-MCA-LDW

**Civil Action**

**NOTICE OF MOTION TO AMEND  
COMPLAINT**

To:

Chanell Branch

Deputy Attorney General

New Jersey Office of the Attorney General – Division of Law

State Police, Employment, & Corrections Section

Richard J. Hughes Justice Complex

25 Market Street, PO Box 112  
Trenton, NJ 08625  
Tel: (609) 376-3376  
Email: Chanell.Branch@law.njoag.gov

To:  
Rutgers University – University Correctional Health Care  
Office of the Secretary  
7 College Avenue  
New Brunswick, NJ 08901

**PLEASE TAKE NOTICE** that Plaintiff Edward Polynice, individually and on behalf of a putative class, will move before the United States District Court for the District of New Jersey on September 21, 2020 for an order granting Plaintiff leave to Amend the Complaint.



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Michael Poreda, Esq.  
*Attorney for Plaintiff*

Date: August 23, 2020